

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA

v.

FRANCIS WHITE

Criminal No. 03-CR-10356-MLW

UNITED STATES DISTRICT COURT
DISTRICT OF MASS

**MOTION TO MODIFY TERMS OF
PRETRIAL RELEASE**

Defendant Francis White respectfully requests that this Court modify the terms of his pre-trial release to allow him to travel out of state for a short period of time with his 14 year old son. In support, Mr. White states as follows:

As described in his Motion for Pretrial Release, Mr. White has a very close relationship with Alex; indeed, his devotion to Alex cannot be questioned. (A copy of this motion is attached hereto as Exh. A). Mr. White is very involved in Alex's life: he not only pays weekly child support for Alex, but more importantly, he spends considerable amounts of time with Alex during the school year, as well as holidays and summer vacations.

For the last two years, Mr. White has taken his son Alex to Puerto Rico for Alex's winter school vacation. In November, 2003 -- before the indictment in this case-- Mr. White decided to continue their annual tradition and made arrangements for their third trip to Puerto Rico. On or about November 13, 2003, Mr. White purchased two round-

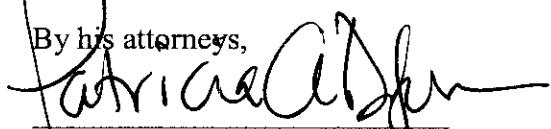
trip tickets, leaving on February 12, 2004 and returning on February 23, 2004. The tickets are for non-stop, direct flights between Boston and San Juan.

As this Court may recall, it previously found that Mr. White is **not** a flight risk. Since that time, there has not been any change in circumstances that would warrant a different conclusion, and there is no reason to believe that Mr. White would not return to Massachusetts to face the charges against him.

WHEREFORE, Mr. White respectfully requests that this Court grant his Motion to Modify Terms of Pretrial Release to allow him to travel to Puerto Rico from February 12-23, 2004.

RESPECTFULLY SUBMITTED,
FRANCIS WHITE

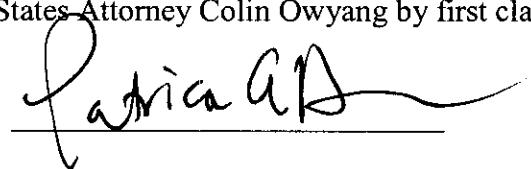
By his attorneys,



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CERTIFICATE OF SERVICE

I, Patricia A. DeJuneas, hereby certify that I have caused a copy of the foregoing document to be served on Assistant United States Attorney Colin Owyang by first class mail, this 22nd Day of January, 2004.



Patricia A. DeJuneas